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Attorneys for Defendants Anthony Pecone,
Premier Benefit Administrators, L.L.C. and
National Entrepreneurs Association

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE SOUTHERN DISTRICT OF NEW YORK

In re:

SOLIDARITY OF LABOR ORGANIZATION
INTERNATIONAL UNION BENEFIT FUND,
a/k/a S.O.L.O. BENEFIT FUND,

Debtor

Chapter 7
Case No. 02-10801(SMB)

ROBERT L. GELTZER, as Chapter 7 Trustee of
SOLIDARITY OF LABOR ORGANIZATION
INTERNATIONAL UNION BENEFIT FUND, a/k/a
S.O.L.O. BENEFIT FUND,

Plaintiff,

Adversary Proceeding
04-04785

DEFENDANT'S MOTION
TO WITHDRAW
THE REFERENCE

10 P: 4:32
D. CRIM. Y.

v.

ANTHONY PECONE, PREMIER BENEFIT
ADMINISTRATORS, LLC and NATIONAL
ENTREPRENEURS ASSOCIATION,

Defendants.

Anthony Pecone, Premier Benefit Administrators, L.L.C. and National Entrepreneurs
Association, L.L.C. ("Defendants"), by and through their attorneys Barnes, Iaccarino, Virginia,

Ambinder & Shepherd, P.L.L.C., file this motion to Withdraw the Reference from the District Court to the Bankruptcy Court ("Motion to Withdraw"). For the reasons set forth in defendants accompanying Memorandum of Law in Support of Their Motion to Withdraw the Reference from the District Court to the Bankruptcy Court, and pursuant to 28 U.S.C. §157 (d) and Local Rule of Bankruptcy Procedure 5011-1, this Court should withdraw the reference of this Adversary Proceeding to the Bankruptcy Court.

WHEREFORE, Defendants respectfully request this Court to withdraw the reference of this Adversary Proceeding to the Bankruptcy Court, and grant Anthony Pecone, Premier Benefit Administrators, L.L.C. and National Entrepreneurs Association, L.L.C. such other and further relief as may be just and proper.

Respectfully submitted,



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